

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE SUNPOWER SECURITIES
LITIGATION

Case No. CV 09-5473-RS

**SUPPLEMENTAL
DECLARATION OF STEPHANIE
A THURIN RE NOTICE
DISSEMINATION**

I, Stephanie A. Thurin, declare and state as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

2. I previously submitted a declaration regarding the dissemination of notice in connection with the administration of the settlement reached in the Action which was executed on May 10, 2013 (“First Declaration”). I am submitting this supplemental declaration in order to provide the Court and the parties to the Litigation with additional information regarding the mailing of the Court-approved Notice of Pendency of Class Action and Proposed Settlement, Final Approval Hearing, and Motion for Attorneys’ Fees and Reimbursement of Litigation Expenses (the “Notice”) and the Proof of Claim and Release Form (“Proof of Claim”), (together, the Notice and Proof of Claim are referred to herein as the “Notice Packet”). At the time of the First Declaration, we had mailed a total of 89,628 Notice Packets to potential Settlement Class Members. Additionally we reported that we had not received any requests for exclusion.¹

¹Unless otherwise defined herein, all capitalized terms shall have the same meaning as set forth in the Stipulation of Settlement dated February 1, 2013 and/or Preliminary Approval Order.

SUBSEQUENT MAILING OF THE NOTICE PACKET

3. Since May 10, 2013, Epiq has mailed an additional 116,638 Notice Packets. Therefore, the total number of Notice Packets mailed to potential Settlement Class Members as of June 20, 2013 is 206,266. The deadline for submitting Proofs of Claim is August 6, 2013. As of June 20, 2013, 7,071 Proofs of Claim have been received. We are in the process of reviewing the Proofs of Claim and corresponding with Claimants regarding any deficiencies in their Proofs of Claim. Once the claims administration process is complete, we expect to provide the Court with an update as to how many Proofs of Claim have been received, and with recommendations as to which Proofs of Claim to accept as valid, and which to reject as invalid.²

EXCLUSION REQUESTS

4. Pursuant to this Court's Preliminary Approval Order, Settlement Class Members who wish to be excluded from the Settlement Class are required to do so in writing so that the request is received by June 12, 2013. Epiq has received nine (9), timely requests for exclusion, representing nine (9) persons or entities. Although some of the exclusion requests do not fully comply with the Court's Preliminary Approval Order as to what information is required, at Lead Counsel's request all exclusion requests have been included. Attached as Exhibit A please find a list of the persons and entities requesting exclusion.

CALL CENTER SERVICES

5. Epiq reserved a toll-free phone number for the Settlement (877) 483-2990 and published that toll-free number in the Notice, in the Proof of Claim form, and on the settlement website.

6. The toll-free number connects callers with an Interactive Voice Recording ("IVR"). The IVR provides potential Settlement Class Members and others who call the toll-free telephone number access to additional information that has been pre-recorded. The toll-free telephone line with pre-recorded information is available 24 hours a day, 7 days a week. Specifically, the pre-recorded message provides callers with a brief summary about the Settlement and the option to select one of several more detailed recorded messages addressing

² In securities class action settlements, the claims administrator typically receives a substantial percentage of claim forms that are initially deficient because, for example, they are lacking supporting documentation, or they indicate that the Claimant did not purchase the relevant securities during the relevant time period. As is typical in securities class action settlements, Epiq will inform Claimants of any deficiencies and provide them with a reasonable opportunity to cure the deficiencies if possible.

1 frequently asked questions. The IVR also allows callers to request that a copy of the Notice
2 Packet be mailed to them or the caller may opt to speak live with a trained operator.

3 7. Epiq made the IVR available on April 8, 2013, the same date Epiq mailed the
4 Notice Packets.

5 8. In addition, Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time
6 (excluding official holidays), callers are able to speak to a live operator regarding the status of
7 the Settlement, obtain help filling out and filing their Proof of Claim form and/or obtain answers
8 to questions they may have about communications they receive from Epiq. During other hours,
9 callers may leave a message for an agent to call them back.

10 9. Epiq will continue operating, maintaining and, as appropriate, updating the IVR
11 until the conclusion of this settlement administration. Epiq will continue providing live operator
12 support until the conclusion of this settlement administration.

13 10. As of June 20, 2013, Epiq has received a total of 1,101 calls, for a total of
14 8,682.69 minutes, to the toll-free number set up for this Settlement.

15 WEBSITE

16 11. Epiq established and is maintaining a website dedicated to this Settlement
17 (www.sunpowersecuritieslitigation.com) to provide additional information to Settlement Class
18 Members and to answer frequently asked questions. Users of the website can download a copy
19 of the Notice, Summary Notice, Proof of Claim, Stipulation of Settlement, and the Preliminary
20 Approval Order, among other relevant documents. The web address was set forth in the
21 published Summary Notice, the mailed Notice, and on the Proof of Claim. The settlement
22 website was operational beginning on April 8, 2013 and is accessible 24 hours a day, 7 days a
23 week.

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct to the best of my knowledge.

26 Executed on June 24, 2013, at Beaverton, Oregon.


27 
28 Stephanie A. Thurin

Exhibit A
Requests for Exclusion

Document #	Name
1	MARLIES EISENFELD
2	MORVAL BANK & TRUST CAYMAN LTD
3	ELDON L DALTON
4	SAMUEL JOSEPH NUGENT
5	TABITHA ZEHMS
6	DIETER H HERDES
7	CRISTIANO NEVES MARTINS
8	CHARLES PAHL
9	RUTH ROWLANDSON